



California Regional Water Quality Control Board

Los Angeles Region



Recipient of the 2001 *Environmental Leadership Award* from Keep California Beautiful

Linda S. Adams
Agency Secretary

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Arnold Schwarzenegger
Governor

November 30, 2006

Bruce Kendall, Deputy Chief Executive
Existing Facilities
Los Angeles Unified School District
333 S. Beaudry Ave., 23rd Floor
Los Angeles, CA 90017

COMMENTS ON THE LOS ANGELES UNIFIED SCHOOL DISTRICT, OCTOBER 2004 POST-CONSTRUCTION-STORM WATER MANAGEMENT PLAN

Dear Mr. Kendall:

We have reviewed the Los Angeles Unified School District's (LAUSD) Storm Water Management Plan (the LAUSD Plan) and the post-construction minimum control measures that you submitted and discussed during our meeting on August 30, 2006.

The California Regional Water Quality Control Board, Los Angeles Region (L.A. Water Board) recognizes that in a highly urbanized region such as Los Angeles, some important constraints that a school district encounters in the selection and implementation of post-construction Best Management Practices (BMPs) are the limited area and the safety of school children, which nevertheless are surmountable.

The L.A. Water Board staff comments on the LAUSD Plan are as follows:

1. We understand that the typical post-construction BMPs that require large space such as infiltration basins, retention basins and extended detention basins may be less suitable options for school development or redevelopment sites;
2. The LAUSD should be able to meet the post-construction BMP requirements by designing or redesigning parking lots, flat surface areas, play ground, athletic fields and landscape buffers using better site design concepts such as runoff reduction; localized treatment; and percolation/ infiltration measures described in technical guidance documents such as '*Site Design Techniques to Meet Development Standards for Stormwater Quality*, (Bay Area Stormwater Management Agencies Association's (BASMAA), 2003) and '*Critical Assessment of Stormwater Treatment and Control Selection Issues*', (Water Environment Research Foundation,2005);
3. The LAUSD should develop appropriate technical design guidelines and specifications for use at the project planning and design stages for each BMP for runoff-reduction, localized

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treatment and percolation/ infiltration; The American Society of Civil Engineers Low Impact Development Subcommittee is expected to maintain a website listing materials, specifications, and computations for better site design basin measures, beginning in 2007;

4. Better site design techniques can also promote energy savings, improve aesthetics, facilitate student environmental education, and conserve water, by incorporating simple techniques into the standard features of typical school design, requiring small changes in design. For instance, an area devoted to playground area and open space can be designed to infiltrate or retain the volume of runoff by using appropriate surface and subsurface materials to reduce runoff volume and flow;
5. The LAUSD should implement as much as possible multiple benefit design concepts such as larger landscaping islands, reduced size of parking stalls and reduced-drive aisles, that will support multi-functional benefits and improve storm water treatment;
6. The L.A. Water Board commends the LAUSD Board of Education's initiative in including storm water quality criteria in the concepts for the LAUSD Collaborative High Performance School (CHPS) project. This should greatly facilitate the planning and design of school sites within your jurisdiction to reduce storm water pollution. We support the CHPS criteria of no net increase in the rate or quantity of storm water runoff from pre-development to the developed condition. We recommend that the second criterion for LAUSD's CHPS for existing facilities, which establishes a 25 percent reduction in the rate and quantity of storm water runoff, be replaced with the goal of 'no discharge from the facility of up to the first one inch of rainfall'; and
7. We recommend that the LAUSD's BMPs and water quality control measures be targeted to priority pollutants of concern including, Sediment, Trash, Bacteria, Metals and petroleum byproducts.

We shall re-schedule the next technical meeting to consider the feasibility of sub-regional BMPs and to discuss other issues as agreed to at the August 30, 2006, meeting. We expect to invite representatives from the City of Los Angeles and the environmental group TreePeople to the meeting, and any other interested parties you may suggest. We will call you in a few weeks to schedule this meeting.

If you have any questions, please call Carlos D. Santos at (213) 620-2093.

Sincerely,

Original Signed

Xavier Swamikannu, D.Env.
Chief, Storm Water Permitting

cc: please see next page

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cc: Darrin Polhemus, Division of Water Quality, State Water Board
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